

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
Civil Action No
Friedrich Lu, Plaintiff

v

Boodie Ugunmba, G4S Secure Solutions (USA), Inc, Melanie Lima
and Trustees of Boston Public Library, Defendants

COMPLAINT

- (1) The court has subject matter jurisdiction over this matter under 28 USC § 1331.
- (2) On Mar 29, 2018 plaintiff Friedrich Lu walked into Boston Public Library (BPL) through the door on Boylston Street, with right hand carrying a sack of bagels (the sack was a large, transparent plastic bag). BPL had rules and regulations in place that food was allowed for consumption at certain designated locations (both indoor and outdoor) within the library.
- (a) In charge of BPL security, Boodie Ugunmba worked for G4S Secure Solutions (USA), Inc -- a Delaware corporation with headquarters at 1395 University Blvd Jupiter, FL, 33458-5289.
- (b) Also in charge of BPL security, Melanie Lima worked for BPL.
- (3) Twenty yards into the library upon arrival, Lu was intercepted by Ugunmba and ordered to leave, due to the bagels (but no further explanation). Lu asked to appeal the decision, and got to talk to Lima, who affirmed the decision without explanation, either. To date, Lu still does not know what offended them, or BPL.
- (4) Count One: 42 USC § 1983. All defendants, under color of state law, ordinance, regulation, custom or usage, deprived Lu of rights secured under Fourteenth Amendment (Due Process and Equal Protection Clauses).
- (8) Lu demands jury trial on damage and court cost.

Plaintiff: Friedrich Lu, pro se Date: March 26, 2021 Email: chi2flu@gmail.com
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